

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN – SOUTHERN DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

Case No 1:20-CR-183-RJJ

V

HON. ROBERT J. JONKER

ADAM FOX.

Defendant.

DEFENDANT ADAM DEAN FOX'S
MOTION IN LIMINE TO MODIFY THE COURTS
PRETRIAL ORDER TO ALLOW EVIDENCE REGARDING
SA CHAMBERS OWNERSHIP OF *EXEINTEL*, LLC

Now Comes Defendant Adam Fox, by and through Counsel, Christopher M. Gibbons of the Law Offices of Gibbons & Boer, and in support of his motion to modify the Courts pretrial order of 2/2/22 to allow evidence regarding SA Chambers ownership of *Exeintel*, LLC

1. The Courts pre-trial order on February 2, 2022, prohibited the Defendant's from presenting any evidence regarding SA Chambers ownership of a private security consulting business, *Exeintel*, LLC. The Court specifically held that the potential prejudice of delay and distraction substantially outweighed whatever evidentiary value SA Chambers interest in *Exeintel* may have.
2. Specifically, Adam Fox requests that the Court modify this order permitting him to establish on the trial record that SA Chambers owned, and was developing, a private

internet security consulting business from April 4, 2019, until December 14, 2021. In addition, to argue in his defense that SA Chambers personal interest in *Exeintel*, LLC adversely affected his judgement in conducting the investigation of the defendants in this case.

3. Defendant Adam Fox submits that this is not complex, time consuming, or confusing and that his Sixth Amendment right to confront and cross-examine SA Chambers on this narrow issue should outweigh the Court's concerns regarding delay or distraction.

Wherefore, Defendant Adam Fox requests this Court to modify the February 2, 2022, pretrial order and permit Adam Fox to raise SA Chambers ownership of *Exeintel*, LLC and to argue that this ownership and his personal ambition to develop the business affected SA Chambers judgment during the investigation and indictment of these defendants.

Date: July 12, 2022.

By: /s/ Christopher M. Gibbons
Christopher M. Gibbons
Attorney for Defendant Adam Fox